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January 6, 2022
VIA ECF

United States District Judge Lewis Liman
United States District Court
Southern District of New York
500 Pearl Street, Room 701
New York, NY 10007

Re: Taylor v. JPMorgan Chase & Co.
21-cv-10588

Dear Judge Liman:

I represent Plaintiff in the above-captioned matter. I write to oppose Defendant's counsel request earlier today for a 60-day extension of Defendant's time to Answer the Complaint. Defendant's counsel first contacted me this morning by phone and email requesting a 60-day extension. I was in mediation most of the day and intended to reply by email later this evening. I respectfully note that on December 13, 2021, I informed Defendant's in-house counsel that I filed the Complaint. While I appreciate the extensions of professional courtesies and routinely consent to such requests, Defendant's request for 60 days is quite excessive and does not bother to explain why Defendant needs such an unusually large extension of time. Accordingly, I respectfully request that Defendant's request be denied, or if granted, be limited to a reasonable duration.

Thank you.

/s/ D. Maimon Kirschenbaum
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